

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS**

DWAYNE HILL,)	
)	
Plaintiff,)	
)	Case No. 19-CV-6080
v.)	
)	Judge Franklin U. Valderrama
CITY OF CHICAGO, <i>et al.</i> ,)	
)	
Defendants.)	JURY TRIAL DEMANDED
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RICKEY FOUNTAIN,)	
)	
Plaintiff,)	Case No. 19-CV-6081
)	
v.)	Judge Franklin U. Valderrama
)	
CITY OF CHICAGO, <i>et al.</i> ,)	
)	JURY TRIAL DEMANDED
Defendants.)	

JOINT STATUS REPORT

Per the Court's Order (Dkt. No. 178), the parties provide the following joint status report:

1. On September 28, 2021, Chief Judge Pallmeyer granted the City's motion to compel the United States' Attorney's Office (the "USAO") to produce grand jury materials and documents related to the federal case *United States v. Spann*, Case No. 17-CR-611-1 (N.D. Ill.). These documents are relevant to determining the extent of gang leader Labar Spann's interference in Plaintiffs' criminal trials and the credibility of several key witnesses in this case. The parties await Chief Judge Pallmeyer's ruling following the USAO's production of certain documents for *in camera* review.

2. Plaintiffs requested that the City conduct a search for documents sufficient to show the City's coordination with federal authorities related to the Spann investigation and the City's

communications with the CCSAO regarding any case involving Labar Spann related to manipulating, intimidating, coercing, and/or extorting witnesses. While the City maintained objections that this request is overly broad, unduly burdensome, and subject to privacy and security concerns, the City has produced documents identifying CPD personnel who may have communicated with federal law enforcement or who may have provided testimony in connection with the federal investigation *U.S. v. Spann*. The City continues to believe that narrowing the scope of the request to target potentially relevant documents, including identifying relevant individuals at the City, the CCSAO, and the USAO, will be more feasible after receiving the documents relied upon by the federal government during grand jury proceedings and the criminal trial against Labar Spann from the USAO. Plaintiffs received the documents discussed above on the afternoon of January 10, 2022. Plaintiffs are in the process of reviewing these documents and will confer further with the City about the status of this request.

3. The City agreed to search for the case and arrest reports that were created in connection with the RD numbers for 21 cases in which Labar Spann was identified as a suspect, as detailed in the parties' previous joint status reports (Dkt. 175; Dkt. 177), and review and produce responsive documents that involve the parties to this case or Labar Spann manipulating, intimidating, coercing, or extorting witnesses. Since the parties' previous joint status report, the City completed its production of these responsive documents on March 1, 2022. Plaintiffs are in the process of reviewing these documents and will confer further with the City about the status of this request.

4. The parties have also taken the depositions of several third-party witnesses since the last joint status report.

Respectfully submitted,

/s/Makeba Rutahindurwa

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CERTIFICATE OF SERVICE

I hereby certify that on April 11, 2022, the foregoing document was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ James P. Fieweger